



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

December 22, 2006

Chris Steinbruner, Treasurer  
Monterey County Republican Central  
Committee Fed.  
P.O. Box 322  
Salinas, CA 93902

**Response Due Date:**  
**January 24, 2007**

Identification Number: C00389981

Reference: 30-Day Post-General Report (10/19/06-11/27/06)

Dear Mr. Steinbruner:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

- The beginning cash balance of this report should equal the ending balance of your 12-Day Pre-General Report (10/1/06-10/18/06). Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.
- The totals listed on Lines 7, 11(a)(i), 11(a)(ii), 21(a)(i), 21(a)(ii), 30(b), 30(c), 31 and 32, Column B of the Summary and Detailed Summary Page(s) appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.
- Schedule B supporting Line 30(b) of your report discloses a payment(s) for "Reimbursement for office & postage," "Reimbursement for Printing & Postage," "FEA 100% Federal: Printing," "FEA 100% Federal: Postage" and "Phone bankers & walkers," which is categorized as Federal Election Activity and therefore, may require the disclosure of the candidate(s) this activity should be attributed to. Expenditures and disbursements for public communications that refer to a clearly identified candidate for Federal

office and that promote, support, attack or oppose any candidate for Federal office, meet the definition of Federal Election Activity under 11 CFR §100.24 and should be disclosed on Schedule B for Line 30(b) along with the identity of the candidate(s).

Further, please be advised that public communications that meet the definition of Federal Election Activity and that also contain express advocacy as defined under 11 CFR §100.22, but do not meet the conditions of exempt activity, would constitute an in-kind contribution, an independent expenditure or a coordinated party expenditure and should be properly disclosed on a Schedule B, E or F supporting Lines 23, 24 or 25, as appropriate rather than on Schedule B for Line 30(b). Please clarify if this activity meets the definition of Federal Election Activity or if it contains express advocacy and amend your report to properly disclose this activity, if necessary.

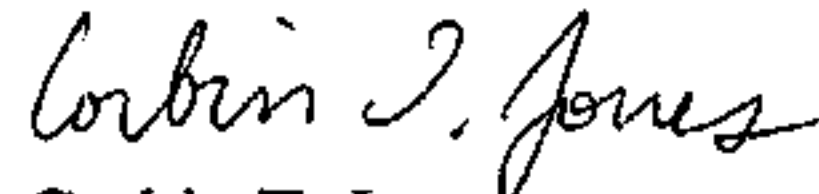
-Schedule B discloses reimbursements to Mainstream Consulting totaling \$16,762.90. However, the sum of the memo entries provided identifying the original vendors associated with these payments total \$17,531.05. Please amend your report to clarify this discrepancy.

-Schedule H4 of your report discloses a reimbursements to Mainstream Consulting for "Invoice for Reimbursements" totaling \$14,938.15. However, the sum of the memo entries provided identifying the original vendors associated with this payment total \$7,080.59. Please be advised that when itemizing reimbursements for goods or services, payment to the original vendors must be itemized as memo entries regardless of amount. Each memo entry must include the name and address of the original vendor, as well as the date, amount and purpose of the original purchase must be provided. Please amend your report to include the missing information and clearly identify on the Schedule H4, which reimbursement each memo entry relates to. 11 CFR §§104.10 and 104.17, and Advisory Opinions 1992-1 and 1996-20, footnote 3

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694- 1177.

Sincerely,



Corbin T. Jones

Campaign Finance Analyst

Reports Analysis Division

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